

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TQ DELTA, LLC, v. 2WIRE, INC.	Plaintiff, Defendant.	Civil Action No. 13-cv-1835-RGA
TQ DELTA, LLC, v. ZHONE TECHNOLOGIES, INC.	Plaintiff, Defendant.	Civil Action No. 13-cv-1836-RGA
TQ DELTA, LLC, v. ZYXEL COMMUNICATIONS, INC. and ZYXEL CORPORATION,	Plaintiff, Defendants.	Civil Action No. 13-cv-2013-RGA
TQ DELTA, LLC, v. ADTRAN, INC.	Plaintiff, Defendant.	Civil Action No. 14-cv-954-RGA
ADTRAN, INC., v. TQ DELTA, LLC.	Plaintiff, Defendant.	Civil Action No. 15-cv-121-RGA

FAMILY 1 PATENTS JOINT CLAIM CONSTRUCTION CHART

Pursuant to ¶ 9 of the Court's Third and Final Scheduling Order, dated April 10, 2017, Plaintiff TQ Delta, LLC and Defendants in the above-captioned cases submit their Joint Claim Construction Chart ("Chart") for the Family 1 Patents (U.S. Patent Nos. 7,835,430 ("the '430 patent"), 7,889,784 ("the '784 patent"), 8,238,412 ("the '412 patent"), 7,570,686 ("the '686

patent”), and 8,432,956 (“the ’956 patent”). The Chart attached as Exhibit A includes the parties’ respective proposed constructions of the disputed language of the asserted claims of the Family 1 Patents. The Chart includes citations to the parties’ intrinsic evidence in support of such constructions. For the Court’s reference, also included in Exhibit A are the parties’ agreed to constructions for language of the asserted claims. The parties reserve their rights to amend and/or supplement their disclosures.

In addition to the Joint Claim Construction Chart attached as Exhibit A, copies of the Family 1 Patents and additional portions of the intrinsic record are attached as Exhibits B – H:

Exhibit	Description
B	’686 patent
C	’430 patent
D	’784 patent
E	’412 patent
F	’956 patent
G	U.S. Provisional Patent Application No. 60/224,308
H	Excerpts from the prosecution history of the ’686 patent

Dated: May 9, 2017

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street, 12th Floor
Wilmington, Delaware 19801
(302) 777-0300
(302) 777-0301 (Fax)
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Counsel for Plaintiff TQ Delta, LLC

MORRIS JAMES LLP

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (Bar No. 3726)
500 Delaware Avenue, Suite 1500
Wilmington, Delaware 19801
(302) 888-6800
kdorsney@morrisjames.com

*Attorneys for Defendants Zyxel
Communications Inc. et. al.*

Respectfully submitted,

Morgan Lewis & Bockius LLP

/s/ Jody Barillare

Colm F. Connolly (#3151)
Jody Barillare (#5106)
The Nemours Building
1007 N. Orange Street, Suite 501
Wilmington, DE 19801
(302) 574-7290
(302) 574-3001
colm.connolly@morganlewis.com
jody.barillare@morganlewis.com

*Attorneys for Defendant 2WIRE
LLC*

Seitz, Van Ogtrop, & Green, P.A.

/s/ James S. Green

James S. Green (DE0481)
222 Delaware Avenue, Suite 1500
P. O. Box 68
Wilmington, DE 19899
(302) 888-0600
(302) 888-0606 (Fax)
green@svglaw.com

*Counsel for Defendant Zhone Technologies,
Inc..*

MORRIS JAMES LLP

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (Bar No. 3726)
500 Delaware Avenue, Suite 1500
Wilmington, Delaware 19801
(302) 888-6800
kdorsney@morrisjames.com

Attorneys for Defendant Adtran Inc.